

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO PLAINTIFF: All Wave II TVT-O Cases	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME
FOR FILING DAUBERT MOTIONS REGARDING DR. MARENNI STANISLAUS**

Plaintiffs respectfully ask this Court for an order granting a 7-day extension of time to file *Daubert* motions regarding Dr. Marenni Stanislaus. This request is Plaintiff's first request for an extension of time for this deadline.

Counsel for Defendants have stated that they do not oppose the requested extension.

This extension is not sought for reason of delay or for any other improper purpose. The extension is needed because the deposition of this expert witness has been delayed by scheduling conflicts. The deposition of Dr. Marenni Stanislaus is scheduled to take place on Friday, July 15, 2016.

WHEREFORE, Plaintiffs request that the Court grant the requested 7-day extension, moving the due date for Plaintiffs' *Daubert* Motions regarding Dr. Marenni Stanislaus to **July 28, 2016**, moving the Response deadline to **August 15, 2016**, and the Reply deadline to **August 25, 2016**.

Dated: July 19, 2016

Respectfully submitted,

/s/ Edward A. Wallace
Edward A. Wallace
Mark R. Miller
Timothy E. Jackson
Wexler Wallace LLP
55 W Monroe Street, Suite 3300
Chicago, Illinois 60603
(T) 312-346-2222
(F) 312-346-0022
eaw@wexlerwallace.com
mrm@wexlerwallace.com
tej@wexlerwallace.com

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on July 19, 2016, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/ Edward A. Wallace